

ABRAMS & BAYLISS LLP  
20 MONTCHANIN ROAD, SUITE 200  
WILMINGTON, DE 19807  
MAIN: 302-778-1000  
FAX: 302-778-1001

NOTICE OF DATA SECURITY INCIDENT

January 5, 2023

[FIRST NAME] [LAST NAME]  
[ADDRESS 1]  
[ADDRESS 2]  
[CITY] [STATE], [ZIP]

Dear [FIRST NAME]:

Abrams & Bayliss LLP (“A&B”) is writing to inform you of a data security incident that may have affected your personal information. A&B is a full-service law firm in Wilmington, Delaware that provides legal services to clients in a wide variety of industries and business sectors and we hold relevant data to serve our clients. In 2019, A&B participated in routine document exchanges on behalf of one of its clients involved in opioid litigation filed by the State of Delaware. As a result of these exchanges, A&B came into possession of certain documents containing several individuals’ prescription information and other personal information deemed to be Protected Health Information (“PHI”). At this time, we have no indication of fraud or misuse of your information as a result of this incident. Nevertheless, we are notifying you to explain the circumstances and to make you aware of the steps we have taken in response to the incident and the resources that we are making available to you, including complimentary credit monitoring.

**What Happened?**

On March 17, 2022 we detected a ransomware cyberattack on our local systems. We immediately took measures to control the incident, launched an investigation, and retained a prominent forensics firm and nationally recognized outside counsel to assist. We also notified the FBI and cooperated with them. We fully recovered through our backup systems.

During our review of the data that may have been impacted by this incident, we determined on December 9, 2022 that some of your personal information was on the servers impacted by the incident.

**What Information May Have Been Involved?**

Our servers contained PHI in connection with routine document exchanges between A&B and the State of Delaware in a civil action captioned *State of Delaware v. Purdue Pharma L.P. et al.*, Civil Action No. N18C-01-223 MMJ CCLD (“*Purdue*”). Your personal information that may have been impacted included certain PHI, such as your full name, date of birth, social security number, health insurance member identification number, prescription medication details, ESI member ID, home address, and other certain protected health information provided to us by the State of Delaware in the *Purdue* case.

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## **What We Are Doing**

The safety of your personal information is important to us. We adopted several new security measures to strengthen the security of A&B's network, internal systems, and applications. We will continue to evaluate additional steps that may be taken to further increase A&B's defense going forward.

As an added precaution to help protect your identity, we are offering a complimentary two-year membership through IDX, a data breach and recovery services expert. IDX identity protection services include: 24 months of Single Bureau Credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

To activate your membership and start monitoring your personal information please follow the steps below:

- To Enroll, Please Visit: <https://app.idx.us/account-creation/protect>
- Or Enroll by Phone: 1-800-939-4170  
Call Center Hours: Mon-Fri | 6am – 6pm Pacific Time
- Enrollment Deadline: April 20, 2023
- Enrollment Code: [XXXXXX]

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in this identify theft product, please contact IDX. Be prepared to provide your Enrollment Code as proof of eligibility for the identity restoration services.

## **What You Can Do**

While we do not have indication of fraud as a result of this incident, in addition to enrolling in the identity theft protection services described above we encourage you to remain vigilant with regards to your personal accounts.

In addition to credit monitoring, we encourage you to review and monitor your account for suspicious activity. Federal regulatory agencies recommend that you remain vigilant for the next 12 to 24 months and report any suspected incidents of fraud to us or the relevant financial institution. We would also encourage you to avoid clicking on links or downloading attachments from suspicious emails and to be cautious of any unsolicited communications that ask for your personal information or refer you to a website asking for personal information.

Please refer to the enclosure entitled "Additional Ways to Protect Your Identity" for additional actions you should consider taking to protect yourself against fraud and identity theft.

## **For More Information**

We take the security of your information very seriously and sincerely regret any inconvenience or concern. Our customers have always been our first concern and highest priority, and we are

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committed to protecting your information and maintaining your trust and confidence. Should you have questions or concerns, please do not hesitate to contact us at (302) 778-1000.

Sincerely,

/s/ *Draft*

John M. Seaman

# **Important Notice**

## **Additional Ways to Protect Your Identity: Important Identity Theft Information**

You may wish to take additional steps to protect your identity. Here are some we suggest you consider:

### **Reviewing Your Accounts and Credit Reports**

Federal regulators recommend that you be especially vigilant for the next 12 to 24 months. As part of staying vigilant, you should regularly review your account statements, and periodically obtain your credit report from one or more of the three national credit reporting companies. Those companies are:

<b>Equifax</b> 1-800-525-6285 Equifax.com	<b>Experian</b> 1-888-397-3742 Experian.com	<b>TransUnion</b> 1-800-680-7289 Transunion.com
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You can obtain your credit report from each of those companies for free once every 12 months. Free reports are available online at [www.annualcreditreport.com](http://www.annualcreditreport.com). You may also obtain a free report by calling toll free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at [www.annualcreditreport.com](http://www.annualcreditreport.com)) to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. If you do not have any free credit reports left, you can still purchase a copy of your credit report by contacting one or more of the three credit reporting companies listed above.

### **Placing a Fraud Alert**

A fraud alert tells lenders that they should verify your identification before they extend credit in your name. Each of the three nationwide credit reporting companies can place a fraud alert on your credit report.

If you wish to place a fraud alert, contact any one of the three credit reporting companies listed above. As soon as one company confirms your fraud alert, the others are notified to place fraud alerts as well.

### **Requesting a Security Freeze on Your Credit Report**

A security freeze prohibits a credit reporting agency from releasing any information from your credit report without written authorization. Placing, lifting, or removing a security freeze is free of charge.

If you wish to place a security freeze on your credit report, you must do so separately at each credit reporting company. The credit reporting companies do not notify each other about security freezes.

Please be aware that while a security freeze is in effect, it may delay, interfere with, or prevent the timely approval of any request you make for new credit, loans, mortgages, employment, housing or other services that require a credit check. If you want to allow a credit check for those or other purposes, you will have to lift the security freeze by contacting each credit reporting company. Each credit reporting agency will provide you a PIN number or a password when you place a security freeze. You will need that PIN or password to lift the freeze, and should be careful to record it somewhere secure.

## **Suggestions if You Are a Victim of Identity Theft**

If you find suspicious activity on your accounts or credit reports, or have other reason to believe your information is being misused, you should take the following steps:

File a Police Report. Get a copy of the report to submit to your creditors and others that may require proof of a crime.

Contact the U.S. Federal Trade Commission (FTC). The FTC provides useful information to identity theft victims and maintains a database of identity theft cases for use by law enforcement agencies. If you file an identity theft complaint with the FTC, your case will be added to that database. You can find more information and file a complaint online at [www.IdentityTheft.gov](http://www.IdentityTheft.gov). You can also file a complaint by calling the FTC's toll-free Identity Theft Hotline at 1-877-IDTHEFT (438-4338), or by mail at Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington, D.C. 20580. You may also wish to obtain a copy of *Identity Theft: A Recovery Plan*, a guide from the FTC to help you guard against and deal with identity theft. It is available online at [https://www.consumer.ftc.gov/articles/pdf-0009\\_identitytheft\\_a\\_recovery\\_plan.pdf](https://www.consumer.ftc.gov/articles/pdf-0009_identitytheft_a_recovery_plan.pdf).

Exercise Your Rights Under the Fair Credit Reporting Act (FCRA). You have certain legal rights under the FCRA. These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have credit reporting companies correct or delete inaccurate, incomplete, or unverifiable information. You can find more information about your rights under the FCRA online at [www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf](http://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf). The laws of your state may provide you with additional rights. Your state's attorney general or consumer protection department may be able to give you more information about your rights under state law.

Keep a record of your contacts. Start a file with copies of your credit reports, police reports, any correspondence, and copies of disputed bills. Keep a log of your conversations with creditors, law enforcement officials, credit reporting companies, and other relevant parties.

**Special Information for Residents of Iowa, Maryland, Massachusetts, New Mexico, North Carolina, Oregon, Rhode Island, and Vermont**

District of Columbia residents may contact the Office of the Attorney General for the District of Columbia, 441 4th Street NW, Suite 1100 South, Washington, D.C. 20001, (202) 442-9828, <http://www.oag.dc.gov>.

Iowa residents may contact law enforcement or the Iowa Attorney General's Office to report suspected incidents of identity theft. This office can be reached by visiting the website at [www.iowaattorneygeneral.gov](http://www.iowaattorneygeneral.gov), calling (515) 281-5164 or requesting more information from the Office of the Attorney General, Hoover State Office Building, 1305 E. Walnut Street, Des Moines, IA 50319.

Maryland residents can learn more about preventing identity theft from the Maryland Office of the Attorney General, by visiting their web site at <http://www.oag.state.md.us/idtheft/index.htm>, calling the Identity Theft Unit at 1.410.567.6491, or requesting more information at the Identity Theft Unit, 200 St. Paul Place, 16<sup>th</sup> Floor, Baltimore, MD 21202.

Massachusetts residents are reminded that you have the right to obtain a police report and request a security freeze as described above. There is no charge to place a security freeze on your account; however, you may be required to provide the credit reporting agency with certain personal information (such as your name, Social Security Number, date of birth and address) and proper identification (such as a copy of a government-issued ID card and a bill or statement) prior to its honoring your request.

New Mexico residents are reminded that you have the right to obtain a police report and request a security freeze as described above and you have rights under the Fair Credit Reporting Act as described above.

New York residents may contact the New York Department of State Division of Consumer Protection,

One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, (518) 474-8583 / (800) 697-1220, <http://www.dos.ny.gov/consumerprotection>; and New York State Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <http://ag.ny.gov>.

North Carolina residents can learn more about preventing identity theft from the North Carolina Office of the Attorney General, by visiting their web site at <http://www.ncdoj.gov/Help-for-Victims/ID-Theft-Victims.aspx>, calling 1.919.716.6400 or requesting more information from the North Carolina Attorney General's Office, 9001 Mail Service Center Raleigh, NC 27699-9001.

Oregon residents may obtain information about preventing identity theft from the Oregon Attorney General's Office. This office can be reached by visiting the website at [www.doj.state.or.us](http://www.doj.state.or.us), calling (503) 378-4400 or requesting more information from the Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096.

Rhode Island residents are reminded that you have the right to obtain a police report and request a security freeze as described above. The consumer reporting agencies may require that you provide certain personal information (such as your name, Social Security Number, date of birth and address) and proper identification (such as a copy of a government-issued ID card and a bill or statement) prior to honoring your request. Residents can learn more by contacting the Rhode Island Office of the Attorney General by phone at 1.410.274.4400 or by mail at 150 South Main Street, Providence, Rhode Island 02903.

Vermont residents may learn helpful information about fighting identity theft, placing a security freeze, and obtaining a free copy of your credit report on the Vermont Attorney General's website at <http://www.atg.state.vt.us>.